

ENVIRONMENTAL SERVICES DEPARTMENT

MEMORANDUM

TO: Steve Peplau, Carroll Dekle

FROM: Harry H. Chiu, Barbara Cenalmor

DATE: February 14, 2001

SUBJECT: Procedure to Determine Crematory Performance Testing Requirement

New Crematories:

Within 180 days of the initial start-up of the crematory, the Permittee shall conduct a performance test for each crematory. The performance test for each unit shall demonstrate compliance of both the emission standards of particulate emissions and visible emissions per Rule 313, Section 300. If a crematory does not pass the performance test, the Permittee shall not use or operate that unit, except for testing purposes, until the unit has passed the performance test.

Existing Crematories:

Providing records exist showing "adequate maintenance" of the crematories, within 60 days of the issuance of the new permit, the Permittee shall conduct a performance test of one (1) crematory chosen by the Department as a representative sample. The performance test shall demonstrate compliance of both the emission standards of particulate emissions and visible emissions per Rule 313, Section 300.

If the crematory does not pass the performance test, the Permittee shall not operate that unit, except for testing purposes, until performance tests have been conducted on all the units, and all units have passed such tests.

One (1) week prior to the submittal of the test protocol, the Department shall make a final decision of which representative crematory is to be tested.

New and Existing Crematories:

The test methods outlined in Rule 313 § 502.1 and § 502.2 shall be utilized.

The Permittee shall submit a protocol for the testing of the crematory to the Department for review and approval at least 30 days prior to commencement of testing.

The Permittee shall notify the Department in writing of the exact date and time of testing at least ten (10) days prior to commencement of testing to allow Department representatives to witness the test.

A test report including the results of all testing shall be submitted to the Department for review within thirty (30) days of test completion. This report shall summarize the results of the testing in sufficient detail to allow a compliance determination to be made.

¹ MCESD will accept "Adequate Maintenance" as a source who has conducted maintenance for each crematory per manufacturer's recommendations or at least once a year per a written maintenance program commonly adopted by the crematory industry, whichever is more stringent. The maintenance program and record shall be available onsite upon inspection.